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Attorneys for Plaintiff
COREPHOTONICS, LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

COREPHOTONICS, LTD.

Plaintiff,

vs.

APPLE INC.

Defendant.

Case No. 3:17-cv-06457-JD (Lead)
Case No. 3:18-cv-02555-JD

**DECLARATION OF JAMES S. TSUEI IN
SUPPORT OF PLAINTIFF
COREPHOTONICS, LTD.'S OPENING
CLAIM CONSTRUCTION BRIEF**

1 I, James S. Tsuei, state as follows:

2 1. I am a member of the State Bar of California and an attorney at the firm of Russ,
3 August & Kabat, counsel for Plaintiff Corephotonics, Ltd. in the above captioned action. I have
4 personal knowledge of the facts set forth herein, and if called upon to testify, could and would
5 testify competently thereto.

6 2. I submit this declaration in support of Corephotonics' Opening Claim Construction
7 Brief, filed on September 29, 2022.

8 3. Attached as **Exhibit 1** is a true and correct copy of an Information Disclosure
9 Statement By Applicant dated April 13, 2015 and filed as part of the prosecution leading to the
10 issuance of the '291 patent. I obtained this document on September 24, 2022, from the U.S. Patent
11 and Trademark Office's Patent Center website at <https://patentcenter.uspto.gov>.

12 4. Attached as **Exhibit 2** is a true and correct copy of a Notice of References Cited
13 and filed on September 25, 2015, in the prosecution leading to the issuance of the '291 patent. I
14 obtained this document on September 24, 2022, from the U.S. Patent and Trademark Office's
15 Patent Center website at <https://patentcenter.uspto.gov>.

16 5. Attached as **Exhibit 3** is a true and correct copy of an Information Disclosure
17 Statement By Applicant dated January 8, 2017 and filed as part of the prosecution leading to the
18 issuance of the '712 patent. I obtained this document on September 24, 2022, from the U.S. Patent
19 and Trademark Office's Patent Center website at <https://patentcenter.uspto.gov>.

20 6. Attached as **Exhibit 4** is a true and correct copy of United States Patent Application
21 Publication No. US 2012/0026366 A1 to Golan and Kipnis. I obtained this document on September
22 25, 2022, from the U.S. Patent and Trademark Office's Patent Center website at
23 <https://patentcenter.uspto.gov>.

24 7. Attached as **Exhibit 5** is a true and correct copy of United States Patent Application
25 Publication No. US 2010/0277619 A1 to Scarff. I obtained this document on September 25, 2022,
26 from the U.S. Patent and Trademark Office's Patent Center website at
27 <https://patentcenter.uspto.gov>.

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8. Attached as **Exhibit 6** is a true and correct copy of WIPO International Publication No. WO 2015/015383 A2 to Shabtay et al. I obtained this document on September 25, 2022, from the World Intellectual Property Organization's Patentscope website at <https://patentscope.wipo.int/search/en/search.jsf>.

9. Attached as **Exhibit 7** is a true and correct copy of Apple's Petition for *Inter Partes* Review, IPR2018-01348, filed on July 13, 2018.

10. Attached as **Exhibit 8** is a true and correct copy of United States Patent 5,946,142 to Hirata et al. I obtained this document on September 23, 2022, from the U.S. Patent and Trademark Office's Patent Center website at <https://patentcenter.uspto.gov>.

11. Attached as **Exhibit 9** is a true and correct copy of United States Patent Application Publication No. 2007/0229987 A1. I obtained this document on September 23, 2022, from the U.S. Patent and Trademark Office's Patent Center website at <https://patentcenter.uspto.gov>.

12. I declare under penalty of perjury under the laws of the United States the foregoing is true and correct.

Executed on September 29, 2022 in Los Angeles, California.

By: /s/ James S. Tsuei
James S. Tsuei